

Attorneys for Plaintiff RAMON JERMAINE SAPP

RAMON JERMAINE SAPP,
Plaintiff,
vs.
COUNTY OF ALAMEDA, COUNTY OF
ALAMEDA SHERIFF'S DEPARTMENT,
SHERIFF CHARLES PLUMMER, sued herein
individually and in his capacity and as Sheriff,
Alameda County, PRISON HEALTH
SERVICES, INC., ALAMEDA COUNTY
MEDICAL CENTER dba HIGHLAND
HOSPITAL, and DOES 1 through 30; and
DOES 1 through 30, inclusive,
Defendants.

NO. 03-1066 PJH
STIPULATION AND ~~[PROPOSED]~~
ORDER EXTENDING DEADLINE FOR
DISCLOSURE OF EXPERT REPORTS
[FRP 26(A)(2)]
Current Trial Date: June 9, 2006
Time: 8:30 a.m
Place: Courtroom 3, 17th Floor

The pre-trial discovery deadline in this case for exchange of expert witnesses and reports is currently set by this Court on June 29, 2005. The parties hereby jointly request that the court extend the discovery deadline for disclosure of expert reports until July 18, 2005. The current deadline for non-expert discovery is August 10, 2005.

1 The reason for this request is as follows:

2 This stipulation and request for extension of pre-trial deadline is brought pursuant to
 3 Local Rule 7-10(b). Outstanding discovery requests by plaintiff directed to defendants Alameda
 4 County Medical Center and Alameda County, Alameda County Sheriff's Department, Sheriff
 5 Charles Plummer and Prison Health Services, Inc. seek documents which plaintiff contends relate
 6 to and materially affect the scope and basis of likely expert opinion testimony at trial. Production
 7 of these documents is due on or about July 8 and 9, 2005. Plaintiff has raised concerns that
 8 without these documents, it may become necessary to engage in rounds of supplemental
 9 disclosures as documents are made available. The parties jointly request an extension of the
 10 disclosure date in order to complete production of documents and develop appropriate expert
 11 disclosures.

12 Further, the parties hereby stipulate that this Court order said continuance for good cause.

13 IT IS SO STIPULATED

14 DATED:

LAW OFFICES OF TRUDY L. MARTIN

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 17 Trudy L. Martin, Attorneys for Plaintiff
 18 RAMON JERMAINE SAPP

19 GALLOWAY, LUCCHESI, EVERSON & PICCHI

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 21
 22 By Martin J. Everson, Esq.
 23 Attorney for Alameda County Medical Center

24 LAW OFFICES OF NANCY HUDGINS

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 26 By Matthew Grigg, Esq.
 27 Attorney for Alameda County, Alameda County
 28 Sheriff's Department, Sheriff Charles Plummer and
 Prison Health Services, Inc.

IT IS HEREBY ORDERED THAT

The pretrial expert disclosure date is continued from June 29, 2005, to July 18, 2005.

Parties will file and serve responses pursuant to FRCP on that date.

DATED: 6/28/05



UNITED STATES ~~MAGISTRATE~~ JUDGE
DISTRICT